

EXHIBIT 1

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

UNITED STATES OF AMERICA, *et al.*,

Plaintiffs,

v.

Case No. 1:24-cv-03973 (AS)(SLC)

LIVE NATION ENTERTAINMENT, INC.

and

TICKETMASTER L.L.C.

Defendants.

**PLAINTIFFS' FIRST SET OF INTERROGATORIES TO DEFENDANTS LIVE
NATION ENTERTAINMENT, INC. AND TICKETMASTER L.L.C.**

Pursuant to Federal Rules of Civil Procedure 26 and 33, Local Civil Rules of the United States District Court for the Southern District of New York, the Civil Case Management Plan and Scheduling Order (“CMO”) (ECF No. 169), and the Protective Order (“PO”) (ECF No. 213), Plaintiffs United States of America, and the States of Arizona, Arkansas, California, Colorado, Connecticut, Florida, Illinois, Maryland, Michigan, Minnesota, Nevada, New Hampshire, New Jersey, New York, North Carolina, Ohio, Oklahoma, Oregon, Rhode Island, South Carolina, Tennessee, Texas, Washington, West Virginia, Wisconsin, and Wyoming, the Commonwealths of Massachusetts, Pennsylvania, and Virginia, and the District of Columbia, acting by and through their respective Attorneys General (collectively, “Plaintiff States”), hereby serve these Interrogatories on Defendants Live Nation Entertainment, Inc. and Ticketmaster L.L.C.

(collectively “Defendants”). Please provide Defendants’ answers, in writing and under oath, to the undersigned counsel, in accordance with the CMO.

DEFINITIONS

Notwithstanding any definition below, each word, term, or phrase used in these requests should be construed broadly to the fullest extent of their meaning in a good-faith effort to comply with the Federal Rules of Civil Procedure, the Local Civil Rules, and the CMO. The definitions and rules of construction in Local Civil Rule 26.3(c) and (d) are incorporated by reference under Local Civil Rule 26.3(a). The definitions provided herein shall apply to the terms defined regardless of capitalization.

1. The term “**artist**” refers to a musician, comedian, or any other type of entertainer who performs at a Live Entertainment Event.

2. The term “**Artist Management Services**” refers to services provided to artists to help develop and manage their careers, often across multiple sectors of the entertainment industry, including Live Entertainment Events.

3. The term “**Artist Representative**” means any agent, manager, or other Person acting on behalf of an artist concerning any Relevant Product or Service.

4. The term “**Concert Booking and Promotions Services**” means the provision of services offered by promoters to venues to attract Concerts, including show-by-show or long-term agreements that compensate a promoter for Concerts at the venue.

5. In accordance with Local Civil Rule 26.3(c)(5), the terms “**Company**,” “**You**,” and “**Live Nation**” are abbreviated names or pronouns referring to Live Nation Entertainment, Inc., and their officers, directors, employees, partners, corporate parents, subsidiaries, including Ticketmaster, L.L.C., or affiliates.

6. The terms “**including**” or “**includes**” means including, but not limited to.

7. The term “**Investigation**” means Plaintiffs’ pre-Complaint investigation into Defendants’ conduct in this Litigation.

8. The term “**Litigation**” means this action *United States et al. v. Live Nation Entertainment, Inc. et al.*, No. 1:24-cv-03973 in the United States District Court for the Southern District of New York.

9. The term “**Live Entertainment Event**” means any musical concert, family show, comedy show, theatric performance, sporting event, or other type of live performance.

10. The term “**Live Nation Amphitheater**” means any amphitheater where Live Entertainment Events are held that the Company owns, leases, operates, or otherwise has a contractual right to exercise control over the booking, rental, or performance of or for Live Entertainment Events.

11. The term “**Amphitheater Tour**” means an artist seeking to perform, or actually performing, more than one Live Entertainment Event at amphitheaters in a calendar year or as part of a specific contractual arrangement.

12. The term “**Promotion Services**” means the services provided to artists to promote one or more Live Entertainment Events, including providing financing, working with an artist to choose the venue(s), book the venue(s), and publicize the Live Entertainment Event(s).

13. The term “**Relevant Product or Service**” (or “**Relevant Products and Services**”) means one or more of the following products or services:

- a. Primary Ticketing Services;
- b. Primary Concert Ticketing Offerings;
- c. Concert Booking and Promotions Services;

- d. Promotion Services; and
- e. Use of Amphitheaters.

14. The term “**Secondary Ticketing Services**” means the provision of services to a venue, consumer, artist, or promoter to facilitate the resale or transfer of a ticket to a Live Entertainment Event.

15. The term “**venue**” means any club, theater, arena, amphitheater, festival site, stadium, or other permanent or temporary structure or location where a Live Entertainment Event is held.

16. The term “**Venue Operations and Booking Services**” means services provided to a venue owner to lease or operate the facility on an ongoing basis, and/or to book Live Entertainment Events on behalf of the venue.

INSTRUCTIONS

1. In addition to the specific instructions set forth below, these interrogatories incorporate the instructions set forth in Federal Rules of Civil Procedure 26 and 33, the Local Civil Rules, and the CMO.

2. Unless otherwise specified, these interrogatories seek responsive information during the period from January 1, 2015, to the present.

3. These interrogatories are continuing in nature, and your duty to supplement your responses to these interrogatories pursuant to Federal Rule of Civil Procedure 26(e) is ongoing. Plaintiffs specifically reserve the right to seek supplementary responses before trial.

4. These interrogatories require you to furnish all information as is available from the Defendants themselves or from sources under their control, including but not limited to information from parents, subsidiaries, agents, or representatives (including attorneys).

5. If you object to any portion of the interrogatory, answer all remaining portions of the interrogatory to which you do not object.

6. If you withhold responsive information because of a claim of privilege or any other legal protection, respond to the extent possible and provide a description that will enable Plaintiffs to assess the claim.

7. The use of a verb in any tense includes the past, present, and future.

8. The use of the singular form of any word includes the plural and vice versa.

INTERROGATORIES

1. Identify all Venues, Artists, Artist Representatives, Artist Management Services providers, Concert Booking and Promotions Services providers, Primary Ticketing Service providers, Secondary Ticketing Service providers, or Venue Operations and Booking Services providers that You have communicated with regarding the Investigation, Litigation, or the conduct alleged in the Complaint.

2. Identify all Artists, Artist Representatives, or Promotion Services providers that purportedly request to play in venues with Primary Ticketing Services provided by the Company, as stated in Your March 29, 2024 letter to the United States, including the artist manager in the text message discussed in the letter and produced as LNE22-002089001.

3. Identify all Venues, Artists, Artist Management Services providers, Concert Booking and Promotion Services providers, or sports teams that have requested, proposed, or sought to discuss with You a non-exclusive agreement for Primary Ticketing.

4. Identify all Venues, Artists, Artist Management Services providers, Concert Booking and Promotion Services providers, or sports teams that have requested, proposed, or sought to discuss with You the use of another company for any proportion of the initial distribution of tickets to fans for a Live Entertainment Event while under an exclusive Primary Ticketing Services contract with the Company.

5. Identify all Venues, Artists, Artist Management Services providers, Concert Booking and Promotion Services providers, sports teams, or sports leagues that have requested, proposed, or sought to discuss with You implementing open distribution and verification of tickets to be sold through other Secondary Ticketing Services providers for Live Entertainment Events for which the Company is the provider of Primary Ticketing Services.

6. Identify all Venues that communicated questions or concerns about, or with which You have discussed, the Company potentially withholding, limiting, relocating, or reducing the promotion or marketing of Live Entertainment Events in connection with the Venue's consideration of another Primary Ticketer.

7. Identify all Venues, Artists, or Artist Representatives that have requested, proposed, or sought to discuss with You the use of another company for Promotion Services while under an exclusive promotion contract with the Company.

8. Identify all Artists who sought an Amphitheater Tour for which the Company submitted a bid for the provision of Promotion Services, but for which the Company was not selected by the artist to provide Promotion Services.

9. Identify all Artists, Artist Representatives, or providers of Promotion Services that have inquired, expressed interest in, negotiated, or utilized a Live Nation Amphitheater for a Live Entertainment Event promoted by a Promotion Services provider other than the Company.

10. Identify and provide a general description of all databases originating from an external source (e.g., Pollstar) within Your possession, custody, and control that You use in the ordinary course of business in connection with any Relevant Product or Service.

Plaintiffs reserve the right to serve additional interrogatories.

Dated: August 9, 2024

/s/ Bonny Sweeney
BONNY SWEENEY
Lead Trial Counsel for Plaintiff United States of America
Jonathan S. Goldsmith
Trial Attorney
United States Department of Justice
Antitrust Division
450 Fifth Street N.W., Suite 4000
Washington, DC 20530
Telephone: (202) 725-0165
Facsimile: (202) 514-7308
Bonny.Sweeney@usdoj.gov
Jonathan.Goldsmith@usdoj.gov

Attorneys for Plaintiff United States

/s/ Robert A. Bernheim

Robert A. Bernheim (admitted *pro hac vice*)
Office of the Arizona Attorney General
Consumer Protection & Advocacy Section
2005 N. Central Avenue
Phoenix, AZ 85004
Telephone: (602) 542-3725
Fax: (602) 542-4377
Robert.Bernheim@azag.gov
Attorney for Plaintiff State of Arizona

/s/ Amanda J. Wentz

Amanda J. Wentz (admitted *pro hac vice*)
Assistant Attorney General
Arkansas Attorney General's Office
323 Center Street, Suite 200
Little Rock, AR 72201
Phone: (501) 682-1178
Fax: (501) 682-8118
Email: amanda.wentz@arkansasag.gov
Attorney for Plaintiff State of Arkansas

/s/ Paula Lauren Gibson

Paula Lauren Gibson (Admitted *Pro Hac Vice*)
Deputy Attorney General
(CA Bar No. 100780)
Office of the Attorney General
California Department of Justice
300 South Spring Street, Suite 1702
Los Angeles, CA 90013
Tel: (213) 269-6040
Email: paula.gibson@doj.ca.gov
Attorneys for Plaintiff State of California

/s/ Conor J. May

Conor J. May (admitted *pro hac vice*)
Assistant Attorney General
Antitrust Unit f
Colorado Department of Law
Conor.May@coag.gov
1300 Broadway, 7th Floor
Denver, CO 80203
Telephone: (720) 508-6000
Attorney for Plaintiff State of Colorado

/s/ Kim Carlson McGee

Kim Carlson McGee (admitted *pro hac vice*)
Assistant Attorney General
Office of the Attorney General of
Connecticut
165 Capitol Avenue
Hartford, CT 06106
Telephone: 860-808-5030
Email: kim.mcgee@ct.gov
Attorney for Plaintiff State of Connecticut

/s/ Elizabeth G. Arthur

Elizabeth G. Arthur (admitted *pro hac vice*)
Assistant Attorney General
Office of the Attorney General for the
District of Columbia
400 6th Street NW, 10th Floor
Washington, DC 20001
Elizabeth.arthur@dc.gov
Attorney for Plaintiff District of Columbia

/s/ Lizabeth A. Brady

Lizabeth A. Brady
Director, Antitrust Division
Liz.Brady@myfloridalegal.com
Florida Office of the Attorney General
PL-01 The Capitol
Tallahassee, FL 32399-1050
850-414-3300
Attorney for Plaintiff State of Florida

/s/ Richard S. Schultz

Richard S. Schultz (Admitted *pro hac vice*)
Assistant Attorney General
Office of the Illinois Attorney General
Antitrust Bureau
115 S. LaSalle Street, Floor 23
Chicago, Illinois 60603
(872) 272-0996 cell phone
(312) 814-4209 facsimile
Richard.Schultz@ilag.gov
Attorney for Plaintiff State of Illinois

/s/ Schonette J. Walker

Schonette J. Walker (Admitted *pro hac vice*)
Assistant Attorney General
Chief, Antitrust Division
swalker@oag.state.md.us
200 St. Paul Place, 19th floor
Baltimore, Maryland 21202
(410) 576-6470
Attorney for Plaintiff State of Maryland

/s/ Katherine W. Krems

Katherine W. Krems (admitted *pro hac vice*)
Assistant Attorney General, Antitrust
Division
Office of the Massachusetts Attorney
General
One Ashburton Place, 18th Floor
Boston, MA 02108
Katherine.Krems@mass.gov
(617) 963-2189
*Attorney for Plaintiff Commonwealth of
Massachusetts*

/s/ LeAnn D. Scott

LeAnn D. Scott (admitted *pro hac vice*)
Assistant Attorney General
Corporate Oversight Division
Michigan Department of Attorney General
P.O. Box 30736
Lansing, MI 48909
Tel: (517) 335-7632
Scottl21@michigan.gov
Attorney for Plaintiff State of Michigan

/s/ Zach Biesanz

Zach Biesanz
Senior Enforcement Counsel
Antitrust Division
zach.biesanz@ag.state.mn.us
Office of the Minnesota Attorney General
445 Minnesota Street, Suite 1400
Saint Paul, MN 55101
Phone: (651) 757-1257
Attorney for Plaintiff State of Minnesota

/s/ Lucas J. Tucker

Lucas J. Tucker (admitted *pro hac vice*)
Senior Deputy Attorney General
Office of the Nevada Attorney General
Bureau of Consumer Protection
100 N. Carson St.
Carson City, NV 89701
Email: ltucker@ag.nv.gov
Attorney for Plaintiff State of Nevada

/s/ Zachary Frish

Zachary A. Frish (admitted *pro hac vice*)
Assistant Attorney General
Consumer Protection & Antitrust Bureau
New Hampshire Attorney General's Office
Department of Justice
1 Granite Place South
Concord, NH 03301
(603) 271-2150
zachary.a.frish@doj.nh.gov
*Attorney for Plaintiff State of New
Hampshire*

/s/ Yale A. Leber

Yale A. Leber (admitted *pro hac vice*)
Deputy Attorney General
New Jersey Office of the Attorney General
124 Halsey Street, 5th Floor
Newark, NJ 07101
Phone: (973) 648-3070
Yale.Leber@law.njoag.gov
Attorney for Plaintiff State of New Jersey

/s/ Jeremy R. Kasha

Jeremy R. Kasha
Assistant Attorney General
Jeremy.Kasha@ag.ny.gov
New York State Office of the Attorney
General
28 Liberty Street
New York, NY 10005
(212) 416-8262
Attorney for Plaintiff State of New York

/s/ Sarah G. Boyce

Sarah G. Boyce (admitted *pro hac vice*)
Deputy Attorney General & General
Counsel
SBoyce@ncdoj.gov
North Carolina Department of Justice
Post Office Box 629
Raleigh, North Carolina 27602
Phone: (919) 716-6000
Facsimile: (919) 716-6050
*Attorney for Plaintiff State of North
Carolina*

/s/ Sarah Mader

Sarah Mader (Admitted *pro hac vice*)
Assistant Attorney General
Antitrust Section
Sarah.Mader@OhioAGO.gov
Office of the Ohio Attorney General
30 E. Broad St., 26th Floor
Columbus, OH 43215
Telephone: (614) 466-4328
Attorney for Plaintiff State of Ohio

/s/ Caleb J. Smith

Caleb J. Smith (admitted *pro hac vice*)
Assistant Attorney General
Consumer Protection Unit
Office of the Oklahoma Attorney General
15 West 6th Street
Suite 1000
Tulsa, OK 74119
Telephone: 918-581-2230
Email: caleb.smith@oag.ok.gov
Attorneys for Plaintiff State of Oklahoma

/s/ Tim Nord

Tim Nord (admitted *pro hac vice*)
Special Counsel
Tim.D.Nord@doj.oregon.gov
Civil Enforcement Division
Oregon Department of Justice
1162 Court Street NE
Salem, Oregon 97301
Tel: (503) 934-4400
Fax: (503) 378-5017
Attorney for Plaintiff State of Oregon

/s/ Joseph S. Betsko

Joseph S. Betsko (admitted *pro hac vice*)
Assistant Chief Deputy Attorney General
Antitrust Section
jbetsko@attorneygeneral.gov
Pennsylvania Office of Attorney General
Strawberry Square, 14th Floor
Harrisburg, PA 17120
Phone: (717) 787-4530
*Attorney for Plaintiff Commonwealth of
Pennsylvania*

/s/ Paul T.J. Meosky

Paul T.J. Meosky (admitted *pro hac vice*)
Special Assistant Attorney General
150 South Main Street
Providence, RI 02903
(401) 274-4400, ext. 2064
(401) 222-2995 (Fax)
pmeosky@riag.ri.gov
Attorney for Plaintiff State of Rhode Island

/s/ Danielle A. Robertson

Danielle A. Robertson (admitted *pro hac
vice*)
Assistant Attorney General
Office of the Attorney General of South
Carolina
P.O. Box 11549
Columbia, South Carolina 29211
DaniRobertson@scag.gov
(803) 734-0274
*Attorney for Plaintiff State of South
Carolina*

/s/ Hamilton Millwee

Hamilton Millwee (admitted *pro hac vice*)
Assistant Attorney General
Office of the Attorney General and
Reporter
P.O. Box 20207
Nashville, TN 38202
Telephone: 615.291.5922
Email: Hamilton.Millwee@ag.tn.gov
Attorney for Plaintiff State of Tennessee

/s/ Diamante Smith

Diamante Smith (admitted *pro hac vice*)
Assistant Attorney General, Antitrust
Division
Trevor Young (admitted *pro hac vice*)
Deputy Chief, Antitrust Division
Office of the Attorney General of Texas
P.O. Box 12548
Austin, TX 78711-2548
(512) 936-1674
Attorney for Plaintiff State of Texas

/s/ Tyler T. Henry

Tyler T. Henry (admitted *pro hac vice*)
Senior Assistant Attorney General
Office of the Attorney General of Virginia
202 North 9th Street
Richmond, Virginia 23219
Telephone: (804) 786-2071
Facsimile: (804) 786-0122
thenry@oag.state.va.us
Attorney for Plaintiff Commonwealth of Virginia

/s/ Rachel A. Lumen

Rachel A. Lumen (admitted *pro hac vice*)
Assistant Attorney General, Antitrust
Division
Washington Office of the Attorney General
800 Fifth Avenue, Suite 2000
Seattle, WA 98104-3188
(206) 464-5343
Rachel.Lumen@atg.wa.gov
Attorney for Plaintiff State of Washington

/s/ Douglas L. Davis

Douglas L. Davis (admitted *pro hac vice*)
Senior Assistant Attorney General
Consumer Protection and Antitrust Section
West Virginia Office of Attorney General
P.O. Box 1789
Charleston, WV 25326
Phone: (304) 558-8986
Fax: (304) 558-0184
douglas.l.davis@wvago.gov
Attorney for Plaintiff State of West Virginia

/s/ Laura E. McFarlane

Laura E. McFarlane (admitted *pro hac vice*)
Assistant Attorney General
Wisconsin Department of Justice
Post Office Box 7857
Madison, WI 53707-7857
(608) 266-8911
mcfarlanele@doj.state.wi.us
Attorney for Plaintiff State of Wisconsin

/s/ William T. Young

William T. Young
Assistant Attorney General
Wyoming Attorney General's Office
109 State Capitol
Cheyenne, WY 82002
(307) 777-7841
william.young@wyo.gov
Attorney for Plaintiff State of Wyoming